

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MICHAEL MOATES,

Plaintiff,

v.

FACEBOOK, INC.,

Defendant.

Civil Action No. 4:20-cv-00896-ALM-KPJ

**AGREED MOTION FOR EXTENSION OF TIME TO FILE RESPONSES AND
REPLIES TO FACEBOOK INC.'S MOTION TO DISMISS [DKT. 28] AND FACEBOOK
INC.'S MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(A) [DKT. 29]**

Plaintiff Michael Moates (“Moates”) and Defendant Facebook, Inc. (“Facebook”) jointly request the extension of deadlines for responses and replies to two motions in this matter. Moates respectfully requests that the Court extend the deadline for him to respond to:

1. Facebook Inc.’s Motion to Dismiss [Dkt. 28]; and
2. Facebook Inc.’s Motion to Transfer Pursuant to 28 U.S.C. § 1404(a) [Dkt. 29].

The current deadline for Moates’ responses to these motions is February 18, 2021. Moates requests a two-week extension of this deadline, to March 3, 2021. Facebook does not oppose Moates’ request for extension of time.

Additionally, should the Court grant Moates’ request for extension, Facebook respectfully requests that the Court extend the deadline for it to file its replies to Moates’ responses by one week, to March 17, 2021. Moates does not oppose Facebook’s request for extension of time.

Dated: February 12, 2021

Respectfully submitted,

/s/ E. Glenn Thames, Jr.

E. Glenn Thames, Jr.

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ATTORNEYS FOR DEFENDANT

FACEBOOK, INC.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Facebook Inc. conferred with Plaintiff

Michael Moates and both parties agree to the relief requested in this motion.

/s/ E. Glenn Thames, Jr.

E. Glenn Thames, Jr.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with this document via the Court's CM/ECF system pursuant to Local Rule CV-5. Service outside the court's electronic-filing system has been completed on February 12, 2021, per the Plaintiff's consent to electronic service, as follows:

Michael Moates at the following email addresses:
michael.moates@thenarrativetimes.org
michaelsmoates@gmail.com

/s/ E. Glenn Thames, Jr.

E. Glenn Thames, Jr.